

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

**JOINT WITNESS AND EXHIBIT LISTS OF THE CELSIUS  
LITIGATION ADMINISTRATOR AND THE DEBTORS**

Mohsin Meghji, as Litigation Administrator (the “Celsius Litigation Administrator”) for Celsius Network LLC and its affiliated debtors (collectively, “Celsius”) and the Debtors (together, with Celsius, the “Parties”), respectfully submit this joint disclosure of the witnesses the Parties may call and exhibits that may be presented at the October 7, 2024 hearing related to *The Celsius Litigation Administrator’s Motion for Relief from the Automatic Stay* [D.I. 16815]:

***Witnesses***

1. Kenneth Ehrler
  - a. Mr. Ehrler is a managing director of M3 Advisory Partners, LP which serves as the financial advisor to the Celsius Litigation Administrator.
  - b. Mr. Ehrler will be attending the hearing in person. The content of Mr. Ehrler’s testimony is set forth in the *Declaration of Kenneth Ehrler in Support of the Celsius Litigation Administrator’s Motion for Relief from the Automatic Stay* [Docket No. 16819] (the “**Ehrler Declaration**”).
  - c. Mr. Ehrler will have a copy of the Ehrler Declaration and other relevant exhibits.
  - d. Celsius does not anticipate that any Party will request to cross examine this witness at this time.

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<sup>1</sup> The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the debtors (collectively, “FTX” or the “Debtors”) and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

## 2. Brian D. Glueckstein

- a. Mr. Glueckstein is a partner in the litigation department of Sullivan & Cromwell LLP.
- b. Mr. Glueckstein will be attending the hearing in person. The content of Mr. Glueckstein's testimony is set forth in the *Declaration of Brian D. Glueckstein in Support of Debtor's Objection to the Celsius Litigation Administrator's Motion for Relief from the Automatic Stay* [Docket No. 19793] (the "**Glueckstein Declaration**").
- c. Mr. Glueckstein will have a copy of the Glueckstein Declaration and other relevant exhibits.
- d. FTX does not anticipate that any Party will request to cross examine this witness at this time.

***Exhibits***

<b>Number</b>	<b>Docket Ref.</b>	<b>Description</b>	<b>Objection(s)</b>
CEL-1	16819 & 17181	<i>Declaration of Kenneth Ehrler in Support of the Celsius Litigation Administrator's Motion for Relief from the Automatic Stay</i>	The Debtors do not object to the declaration to be entered into evidence, provided that the entry of the declaration into evidence is for purposes of this hearing only.
CEL-1a	17181-1	<i>Memorandum Opinion and Order Regarding Ownership of Earn Account Assets</i> , Case No. 22-10964 (MG) (Bankr. S.D.N.Y. Jan. 4, 2023)	The Debtors object to entry of this exhibit on the basis of hearsay.  The Debtors agree to this exhibit being part of the record for purposes of this hearing only on the basis that the Court can take judicial notice of the court

			opinion and order.
CEL-1b	17181-2	<i>Transcript of Hearing Before the Honorable Martin Glenn United States Bankruptcy Judge, In the Matter of: Celsius Network LLC, Case No. 22-10964 (Bankr. S.D.N.Y. Dec. 7, 2022)</i>	<p>The Debtors agree this exhibit being part of the record for purposes of this hearing only on the basis that the Court can take judicial notice of the court document.</p> <p>The Debtors object to entry of this exhibit on the basis of hearsay.</p>
CEL-1c (Redacted)	24318-1	Revised Subsequent Transfers Schedule	<p>The Debtors object to entry of this exhibit on the basis of hearsay and lack of foundation.</p> <p>The Debtors agree that this exhibit can be part of the record for purposes of this hearing only on the basis that the Court can take judicial notice of the document.</p>
CEL-1d	24318-2	Quoine Transfers Schedule	<p>The Debtors object to entry of this exhibit on the basis of hearsay and lack of foundation.</p> <p>The Debtors agree that this exhibit can be part of the record for purposes of this hearing only on the basis that the Court can take judicial notice of the document.</p>

CEL-2	16815-3	Draft Complaint	<p>The Debtors object to entry of this exhibit on the basis of hearsay and lack of foundation.</p> <p>The Debtors agree that this exhibit can be part of the record for purposes of this hearing only on the basis that the Court can take judicial notice of the document.</p>
CEL-3	Proof of Claim Number 3938	Original Proof of Claim of Celsius Network LLC as against FTX Trading Ltd.	<p>The Debtors object to entry of this exhibit on the basis of hearsay.</p> <p>The Debtors agree that this exhibit can be part of the record for purposes of this hearing only on the basis that the Court can take judicial notice of the document</p>
CEL-4	22774-1	Amended Proof of Claim of Celsius Network LLC as against FTX Trading Ltd.	<p>The Debtors object to entry of this exhibit on the basis of hearsay and lack of foundation.</p> <p>The Debtors agree that this exhibit can be part of the record for purposes of this hearing only on the basis that the Court can take judicial notice of the document</p>

CEL-5		Transcript of Hearing of June 25, 2024, <i>In re FTX Trading Ltd.</i> , Case No. 22-11068 (JTD)	<p>The Debtors object to entry of this exhibit on the basis of hearsay.</p> <p>The Debtors agree that this exhibit can be part of the record for purposes of this hearing only on the basis that the Court can take judicial notice of the document.</p>
CEL-6		PR Newswire, <i>FTX Announces Overwhelming Support from Creditors for Plan of Reorganization</i> (Aug. 21, 2024), <a href="https://www.prnewswire.com/news-releases/ftx-announces-overwhelming-support-from-creditors-for-plan-of-reorganization-302227961.html">https://www.prnewswire.com/news-releases/ftx-announces-overwhelming-support-from-creditors-for-plan-of-reorganization-302227961.html</a> .	
CEL-7	22946	<i>Order Authorizing the Debtors' Entry Into, and Performance Under, the First Amendment and Restatement to Global Settlement Agreement</i>	<p>The Debtors object to entry of this exhibit on the basis of hearsay.</p> <p>The Debtors agree that this exhibit can be part of the record for purposes of this hearing only on the basis that the Court can take judicial notice of the document</p>
FTX-1	19793	<i>Declaration of Brian D. Glueckstein in Support of Debtor's Objection to the Celsius Litigation Administrator's Motion for Relief from the Automatic Stay</i>	Celsius does not object to the declaration to be entered into evidence, provided that the entry of the declaration into evidence is for purposes of this

			hearing only.
FTX-1a	19793-1	FTX Non Customer Proof of Claim Form submitted by Celsius Network Limited and its affiliated debtors on June 29, 2023 purporting to assert a claim against Quoine Pte. Ltd.	Celsius agrees that this exhibit can be part of the record for purposes of this hearing only on the basis that the Court can take judicial notice of the document.
FTX-1b	16819-2	<i>Transcript of Hearing Before the Honorable Michael E. Wiles United States Bankruptcy Judge, In the Matter of: Voyager Digital Holdings, Inc., Case No. 22-109643 (Bankr. S.D.N.Y. Jan. 24, 2023)</i>	<p>The Debtors are not offering this exhibit for the truth of the matter asserted therein and only offer it as part of the record for this hearing only based on the Court's ability to take judicial notice of the document.</p> <p>Celsius agrees that this exhibit can be part of the record for purposes of this hearing only on the basis that the Court can take judicial notice of the document.</p> <p>Furthermore, Celsius asserts that this exhibit is hearsay, and is not admissible for the truth of the matter asserted.</p>
FTX-2		<i>Excerpted Global Notes and Statement of Limitations, Methodology and Disclaimers Regarding the Debtors' Schedules of Assets and Liabilities and Statements of Financial Affairs,</i>	Celsius agrees that this exhibit can be part of the record for purposes of this hearing only on the basis that the Court can take judicial

		Case No. 22-10964-MG (Bankr. S.D.N.Y. Oct. 5, 2022)	<p>notice of the document.</p> <p>Furthermore, Celsius asserts that this exhibit is hearsay, and is not admissible for the truth of the matter asserted.</p> <p>Finally, Celsius objects to this exhibit on the basis of lack of foundation.</p>
FTX-3	1519	<i>Order (I)(A) Establishing Deadlines for Filing Non-Customer and Government Proofs of Claim and Proofs of Interest and (B) Approving the Form and Manner of Notice Thereof and (II) Granting Related Relief</i>	<p>The Debtors are not offering this exhibit for the truth of the matter asserted therein and only offer it as part of the record for this hearing only based on the Court's ability to take judicial notice of the document.</p> <p>Celsius agrees that this exhibit can be part of the record for purposes of this hearing only on the basis that the Court can take judicial notice of the document.</p>
FTX-4		<i>In re Celsius Network, LLC</i> , 647 B.R. 631 (Bankr. S.D.N.Y. 2023).	<p>The Debtors are not offering this exhibit for the truth of the matter asserted therein and only offer it as part of the record for this hearing only based on the Court's ability to take judicial</p>

			<p>notice of the document.</p> <p>Celsius agrees that this exhibit can be part of the record for purposes of this hearing only on the basis that the Court can take judicial notice of the document.</p>
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Dated: October 4, 2024

**COLE SCHOTZ P.C.**

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